

Buchanan

George C. Morrison
215 665 3909 / 212 440 4403
george.morrison@bipc.com

Andrew T. Simmons
215 665 5341
andrew.simmons@bipc.com

Two Liberty Place
50 S. 16th Street, Suite 3200
Philadelphia, PA 19102-2555
T 215 665 8700
F 215 665 8760

July 2, 2025

VIA ECF

The Honorable Gail A. Weilheimer
United States District Judge
7614 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

Re: *Bo Hunt v. Valley Forge Military Academy Foundation*, No. 2:25-cv-01323

Dear Judge Weilheimer:

This firm represents Defendant, Valley Forge Military Academy Foundation d/b/a Valley Forge Military Academy and College, in the above-captioned matter. In accordance with this Honorable Court's June 26, 2025, Order (ECF No. 21), Defendant writes to request that this Court treat its Pending Motion to Dismiss (ECF No. 20) as relating forward to the Corrected Amended Complaint (ECF No. 22).

Defendant notes the procedural history of this case. On May 6, 2025, the Parties met and conferred regarding Defendant's intention to file a Fed. R. Civ. P. 12(b)(6) Motion to Dismiss the Amended Complaint, which contained a single Section 1983 claim. During this meet and confer, and after defense counsel explained the grounds for dismissal, which are set forth in the Pending Motion to Dismiss, Plaintiff's counsel reviewed the Amended Complaint and represented, for the first time, that "*this should be a Title IX claim,*" not a Section 1983 claim.

Presently, and despite formally filing two prior Section 1983 claims (as alleged in the initial Complaint and now the Amended Complaint), Plaintiff has yet again filed a single-count Section 1983 claim with this Court, despite understanding that the claim is not legally viable. Under these circumstances, and as requested in the Pending Motion to Dismiss, Defendant reiterates its request

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that this Honorable Court dismiss Plaintiff's Corrected Amended Complaint in its entirety, and with prejudice. Thank you.

Respectfully submitted,

/s/ George C. Morrison, Esq.
George C. Morrison, Esquire (PA 203223)
Andrew T. Simmons, Esquire (PA 331973)
BUCHANAN INGERSOLL & ROONEY PC
Two Liberty Place
50 S. 16th Street, Suite 3200
Philadelphia, PA 19102
(215) 665-3909
george.morrison@bipc.com
andrew.simmons@bipc.com
Counsel for Defendant

cc: All counsel of record (via ECF)